

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**BILL OF INFORMATION FOR THEFT OF GOVERNMENT MONEY,  
POSSESSION OF STOLEN MAIL MATTER, AND IDENTITY THEFT**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
ALICIA VICTORIA GEE	*	VIOLATIONS: 18 U.S.C. § 641
	*	18 U.S.C. § 1708
	*	18 U.S.C. § 1028(a)(7)
	*	
	*	
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The United States Attorney charges that:

**COUNT 1: THEFT OF GOVERNMENT FUNDS**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. The defendant, **ALICIA VICTORIA GEE**, was married to E.G. on May 28, 1994.
2. On June 1, 2005, E.G. purchased the family residence located at 716 Lynnette Drive, Metairie, Louisiana 70003. Defendant, **ALICIA VICTORIA GEE**, lived at 716 Lynnette Drive, Metairie, Louisiana on and before August 29, 2005.
3. On August 29, 2005, Hurricane Katrina made landfall in Louisiana causing widespread damage to the Gulf Coast region of Louisiana, including the New Orleans, Louisiana area.

4. After Hurricane Katrina devastated the City of New Orleans, the Federal Emergency Management Agency (“FEMA”) immediately provided disaster assistance to the individuals affected by the storm including emergency assistance funding. FEMA was an agency of the United States providing emergency assistance which was funded by the United States of America.

5. On or about August 31, 2005, the defendant, **ALICIA VICTORIA GEE**, applied for emergency assistance from Farmers Insurance Group (“Farmers”), the insurer of the property located at 716 Lynnette Drive, Metairie, LA.

6. On September 8, 2005, the property located at 716 Lynnette Drive, Metairie, LA 70003 experienced an electrical fire and the house was rendered uninhabitable. As a result of the fire, the ability to determine whether or not the property sustained flood damage was destroyed.

7. On or about September 12, 2005, the defendant, **ALICIA VICTORIA GEE**, applied for FEMA assistance for damages to the property located at 716 Lynnette Drive, Metairie, LA 70003 as a result of Hurricane Katrina and failed to identify that the property was insured by Farmers.

8. On or about September 13, 2005, FEMA issued a letter to the defendant, **ALICIA VICTORIA GEE**, stating that, by law, FEMA cannot pay for damage that is covered by insurance.

9. From on or about September 7, 2005 to on or about August 22, 2006, Farmers issued approximately \$173,228, pursuant to Policy # 0927731508, to E.G. and defendant, **ALICIA VICTORIA GEE**, for loss of contents, living expenses and the replacement value of their home located at 716 Lynnette Drive, Metairie, LA.

10. The defendant, **ALICIA VICTORIA GEE**, failed to inform FEMA that she received funds from Farmers in the form of rental assistance and loss of content reimbursement.

11. On or about November 3, 2005, the defendant, **ALICIA VICTORIA GEE**, provided FEMA with a false and fraudulent rental re-certification and stated: that she was not the owner of the property located at 716 Lynette Drive, Metairie, LA; that there was no homeowner's insurance on the property; and E.G. was her brother (not her husband) and landlord whom she rented from prior to Hurricane Katrina.

12. From on or about October 5, 2005 to on or about October 25, 2007, the defendant, **ALICIA VICTORIA GEE**, did submit and caused to be submitted a disaster application to FEMA for disaster relief benefits, falsely and fraudulently claiming that she was renting property at 1312 North Sibley, Metairie, LA 70003 and that P.D. was her landlord, when in truth and in fact, defendant was living elsewhere.

**B. THE OFFENSE - THEFT OF GOVERNMENT FUNDS:**

From on or about September 2005 to on or about November 2007, in the Eastern District of Louisiana and elsewhere, the defendant, **ALICIA VICTORIA GEE**, did wilfully, knowingly steal, purloin and convert to her own use money of the United States, to which she was not entitled, having a value of \$41,730.

All in violation of Title 18, United States Code, Section 641.

**COUNT 2: POSSESSION OF STOLEN MAIL MATTER**

On or about December 12, 2008, in the Eastern District of Louisiana, **ALICIA VICTORIA GEE**, unlawfully had in her possession, knowing it to have been stolen, the contents of an envelope address to P. D., \*\*\*\* N. Sibley Street, Metairie, Louisiana, 70003, which envelope had been stolen from the mail, said contents being one (1) Bank of America bank account statement dated February

2008 and Bank of America convenience check numbers 1123, 1124, and 1125 from the bank account of P. D., \*\*\*\* N. Sibley Street, Metairie, La 70003, bearing account number \*\*\*\* \* 8922.

All in violation of Title 18, United States Code, Section 1708.

### **COUNT 3: IDENTITY THEFT**

On or about May 3, 2008, in the Eastern District of Louisiana, the defendant, **ALICIA VICTORIA GEE**, did knowingly possess and use, in and affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit: the name, address, social security number, financial and credit information of P.D. with the intent to commit unlawful activity that constitutes a violation of federal law, to wit: social security number misuse (Title 42, United States Code, Section 408(a)(7)(B)); and by such conduct the defendant obtained items of value aggregating \$1,000 or more during a one year period.

All in violation of Title 18 United States Code, Section 1028(a)(7).

### **NOTICE OF FRAUD FORFEITURE**

1. The allegations of Count 1 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Count 1, defendant, **ALICIA VICTORIA GEE**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all

property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 641, including but not limited to:

- a. At least \$53,097 in United States Currency and all interest and proceeds traceable thereto.
- b. The government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the fraudulently-obtained proceeds.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

#### **NOTICE OF IDENTITY THEFT FORFEITURE**

1. The allegations of Count 3 this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United

States of America pursuant to the provisions of Title 18, United States Code, Sections 1028(a)(7) and 982.

2. As a result of the offense, alleged in Count 3, the defendant, **ALICIA VICTORIA GEE**, shall forfeit to the United States all property real or personal, constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of identity theft, in violation of Title 18, United States Code, Section 1028(a)(7).

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.



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New Orleans, Louisiana  
June 24, 2011